

December 13, 2011

Mr. Ben Ellenberger
Santa Barbara County APCD
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

**Subject: Part 70 PTO Modification Application – Change RO
Carpinteria Gas Plant (PTO 7996-R8)**

Dear Mr. Ellenberger:

Enclosed please find Venoco's application to change the name of the Responsible Official to Ed O'Donnell. Based on guidance from Brian Kato, this application is needed ahead of our recent Part 70 re-evaluation application.

Please debit Venoco's APCD account for any applicable permit fees. You can contact me at (805) 745-2264, or pcocoran@venocoinc.com, if you have any questions or comments regarding this submittal.

Sincerely,

Patrick T. Corcoran
Environmental Coordinator

Enclosures Noted

C: Alex Bealer, Reese-Chambers

STATIONARY SOURCE SUMMARY

(Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: **Venoco Inc.**

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: **Carpinteria Gas Plant**

2. Four digit SIC Code: **1311**

USEPA AIRS Plant ID (for APCD use only):

3. Parent Company (if different than Source Name):

4. Mailing Address of Responsible Official: **6267 Carpinteria Ave., Suite 100, Carpinteria, CA 93013**

5. Street Address of Source Location (include Zip Code): **5675 Carpinteria Ave., Carpinteria, CA 93013**

6. UTM Coordinates (if required) (see instructions):

7. Source located within: 50 miles of the state line ☐ Yes ☒ No
50 miles of a Native American Nation ☒ Yes ☐ No ☐ Not Applicable

8. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government
☐ Partnership ☐ Utility Company

9. Legal Owner's Name: **Venoco Inc.**

10. Owner's Agent Name (if any):

Title:

Telephone #:

11. Responsible Official: **Ed O'Donnell**

Title: **Senior Vice-President**

Telephone #: **(805) 745-2100**

12. Plant Site Manager/Contact: **Doug Taylor**

Title: **Operations Supervisor**

Telephone #: **(805) 745-4527**

13. Type of facility: **Gas Processing**

14. General description of processes/products:
Crude Oil & Natural Gas Processing

15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? ☐ Yes ☒ No

16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? ☐ Not Applicable ☐ Yes ☒ No
(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

STATIONARY SOURCE SUMMARY (Form 1302-A2)

APCD: Santa Barbara County Air Pollution Control District	➤ APCD USE ONLY ◀ APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
Initial SBCAPCD's Regulation XIII Application		
Permit Renewal		
Significant Permit Revision *		
Minor Permit Revision*		
Administrative Amendment	7996-R8	April 2012

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:
- a:
- | | |
|--|--|
| <input type="checkbox"/> Portable Source | <input type="checkbox"/> Voluntary Emissions Caps |
| <input type="checkbox"/> Acid Rain Source | <input type="checkbox"/> Alternative Operating Scenarios |
| <input type="checkbox"/> Source Subject to MACT Requirements | <input type="checkbox"/> [Section 112] |
- b: ☒ None of the options in 1.a. are applicable
2. Is source operating under a Title V Program Compliance Schedule? ☐ Yes ☒ No
3. For permit modifications, provide a general description of the proposed permit modification:
- Change Responsible Official**

*Requires APCD-approved NSR permit prior to a permit revision submittal

CERTIFICATION STATEMENT (Form 1302-M)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

<p>Forms included with application</p> <p> <input checked="" type="checkbox"/> Stationary Source Summary Form <input type="checkbox"/> Total Stationary Source Emission For <input type="checkbox"/> Compliance Plan Form <input type="checkbox"/> Compliance Plan Certification Form <input type="checkbox"/> Exempt Equipment Form <input checked="" type="checkbox"/> Certification Statement Form </p> <p style="text-align: center;">List other forms or attachments</p> <p> _____ _____ _____ _____ </p> <p>[] check here if additional forms listed on back</p>	<p>Attachments included with application</p> <p> <input type="checkbox"/> Description of Operating Scenarios <input type="checkbox"/> Sample emission calculations <input type="checkbox"/> Fugitive emission estimates <input type="checkbox"/> List of Applicable requirements <input type="checkbox"/> Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance <input type="checkbox"/> Facility schematic showing emission points <input type="checkbox"/> NSR Permit <input type="checkbox"/> PSD Permit <input type="checkbox"/> Compliance Assurance monitoring protocols <input type="checkbox"/> Risk management verification per 112(r) </p>
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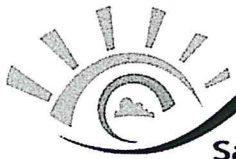
I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Ed O'Donnell 12/13/11
 Signature of Responsible Official Date

Print Name of Responsible Official: Ed O'Donnell

Title of Responsible Official and Company Name: Sr. VP



**Santa Barbara County
Air Pollution Control District**

7010 1060 0002 4620 2287

DEC 02 2011

Mr. Pat Corcoran
Venoco, Inc.
6267 Carpinteria Avenue, Suite 100
Carpinteria, CA 93013-1423

FID: 00027
Permit: P7R 07996 - R9
SSID: 00027

Re: Incomplete Part 70 Permit Renewal / Reevaluation Application 07996 - R9

Dear Mr. Corcoran:

On October 6, 2011, the Santa Barbara County Air Pollution Control District (District) received your application for Part 70 Permit Renewal / Reevaluation (PT-70/Reeval) No. 07996 - R9 for your equipment at the Carpinteria gas plant in Carpinteria. This letter is to inform you that the application is incomplete. Additional information and/or clarification of information already submitted is required. In order to complete the application, please respond to each of the items listed in the attachment. After we receive the requested information, we will inform you within 30 days if the application is complete.

According to Rule 208.D.4, the application will be denied 120 days after the date of filing if sufficient information needed to deem the application complete has not been submitted, unless the District has, in writing, extended the time.


Please be advised that construction of your facility without a **final** PT-70/Reeval is a violation of District rules and the California Health and Safety Code.

Please include the Facility Identification (FID) and Permit numbers shown above on all correspondence regarding this permit application. If you have any questions, please call me at (805) 961-8898. Thank you for your cooperation.

Sincerely,


Brian Kato, Air Quality Engineer I
Engineering & Compliance Division

Attachment: Incompleteness Items

cc:  Carpinteria Gas Plant 00027 Project File
ECD Chron File
Brian Kato (District)

\\sbcapcd.org\shares\Groups\ENGR\WP\Oil&Gas\Venoco - Carpinteria\Reevals\PTO 7996 R9\PT-70-Reeval 07996 R9 - ATC Incompleteness - 12-1-2011

ATTACHMENT

PT-70/REEVAL NO. 07996 - R9 INCOMPLETENESS ITEM LIST

1. Please re-submit Form 1302 signed by the correct responsible official.



October 5, 2011

Mr. Ben Ellenberger
Santa Barbara County APCD
260 N. San Antonio Road, Suite A
Santa Barbara, CA 93110-1315

Subject: Part 70 PTO Renewal Application
Carpinteria Gas Plant (PTO 7996-R8)

Dear Mr. Ellenberger:

Enclosed please find Venoco's application to renew its Permit to Operate for the Carpinteria Gas Plant. The submittal deadline for this application is October 27, 2011, six months before the expiration date of April 27, 2012, as stated in Condition 9.A.6 of PTO 7996-R8. There have been no permit modifications since the issue of PTO 7996-R8 in April 2009.

Please debit Venoco's APCD account for the permit fees. You can contact me at (805) 745-2264, or pcocoran@venoco.com, if you have any questions or comments regarding this submittal.

Sincerely,

Patrick T. Corcoran
Environmental Coordinator

Enclosures Noted

C: Doug Taylor, Venoco, Inc.
Alex Bealer, Reese-Chambers

PT-20/Reeval 7556-129
FID # 0027

STATIONARY SOURCE SUMMARY (Form 1302-A1)

APCD: Santa Barbara County Air Pollution Control District

COMPANY NAME: Venoco Inc.

RECEIVED

OCT 06 2011

SBCAPCD

➤ APCD USE ONLY ◀

APCD IDS Processing ID:

Application #:

Date Application Received:

Application Filing Fee*:

Date Application Deemed Complete:

I. SOURCE IDENTIFICATION

1. Source Name: Carpinteria Gas Plant

2. Four digit SIC Code: 1311

USEPA AIRS Plant ID (for APCD use only):

3. Parent Company (if different than Source Name): Venoco Inc.

4. Mailing Address of Responsible Official: 6267 Carpinteria Ave., Suite 100, Carpinteria, CA 93013-1423

5. Street Address of Source Location (include Zip Code): 5675 Carpinteria Ave., Carpinteria, CA 93013

6. UTM Coordinates (if required) (see instructions):

7. Source located within: 50 miles of the state line ☐ Yes ☒ No

50 miles of a Native American Nation ☒ Yes ☐ No ☐ Not Applicable

8. Type of Organization: ☒ Corporation ☐ Sole Ownership ☐ Government

☐ Partnership ☐ Utility Company

9. Legal Owner's Name: Venoco Inc.

10. Owner's Agent Name (if any):

Title:

Telephone #:

11. Responsible Official: Ed O'Donnell Title: Sr. Vice President Telephone #: (805) 745-2100

12. Plant Site Manager/Contact: Doug Taylor Title: Operations Supervisor Telephone #: (805) 745-4527

13. Type of facility: Gas Processing

14. General description of processes/products: Crude Oil & Natural Gas Processing

15. Does your facility store, or otherwise handle, greater than threshold quantities of any substance on the Section 112(r) List of Substances and their Thresholds (see Attachment A)? ☐ Yes ☒ No

16. Is a Federal Risk Management Plan [pursuant to Section 112(r)] required? ☐ Not Applicable ☐ Yes ☒ No

(If yes, attach verification that Risk Management Plan is registered with appropriate agency or description of status of Risk Management Plan submittal.)

* Applications submitted without a filing fee will be returned to the applicant immediately as "improper" submittals

STATIONARY SOURCE SUMMARY

(Form 1302-A2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

II. TYPE OF PERMIT ACTION

	CURRENT PERMIT (permit number)	EXPIRATION (date)
<input type="checkbox"/> Initial SBCAPCD's Regulation XIII Application		
<input checked="" type="checkbox"/> Permit Renewal	PTO 7996-R8	April 27, 2012
<input type="checkbox"/> Significant Permit Revision*		
<input type="checkbox"/> Minor Permit Revision*		
<input type="checkbox"/> Administrative Amendment		

III. DESCRIPTION OF PERMIT ACTION

1. Does the permit action requested involve:

a:

☐ Portable Source

☐ Acid Rain Source

☐ Source Subject to MACT Requirements [Section 112]

☐ Voluntary Emissions Caps

☐ Alternative Operating Scenarios

b: ☒ None of the options in 1.a. are applicable

2. Is source operating under a Title V Program Compliance Schedule? ☐ Yes ☒ No

3. For permit modifications, provide a general description of the proposed permit modification: None

*Requires APCD-approved NSR permit prior to a permit revision submittal

TOTAL STATIONARY SOURCE EMISSIONS (Form 1302-B)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

I. TOTAL STATIONARY SOURCE EMISSIONS

Provide a brief description of operating scenario: Business as Usual

POLLUTANT* (name)	EMISSIONS (tons per year)	PRE-MODIFICATION EMISSIONS (tons per year)	EMISSIONS CHANGE (tons per year)
NO _x	59.12		Zero for all pollutants
ROC	59.23		
CO	1007.38		
SO _x	1.06		
PM	2.68		
PM ₁₀	2.68	Criteria pollutants FTPE from Table 5.3 in PTO 7996-R8	
HAP-Hexane	2.41	HAPS from APCD Administrative File: "Venoco Carp GP Ton Per Year.xls"	
HAP-Other (see attached list)	1.04		

* Emissions for all pollutants for which the source is major and for all NSPS/MACT-regulated air pollutants must be reported. HAP emissions must be determined, and those exceeding one ton per year from any emission unit category must also be quantified; if less than one ton per year, just list the HAPs emitted by name.

List of HAPS Included as “HAP-Other” in Form 1302-B

Acetaldehyde	Lead
Acrolein	Manganese
Aluminum Flake	Mercury
Arsenic	Methanol
Benzene	Methy Ethyl Ketone
Beryllium	Methylene Chloride
Biphenyl	Naphthalene
1,3-Butadiene	Nickel
Butyl Alcohol	PAHs
Cadmium	Phenol
Carbon tetrachloride	Pigment Orange - PAH Derivative
Chlorobenzene	Propylene
Chloroform	Propylene Glycol Methyl Ether Acetate
Chromium (Hexavalent)	Propylene Glycol Monomethyl Ether
Chromium (total)	Selenium
Copper	Styrene
1,1-dichloroethane	Tert-butyl Acetate
1,2-dichloropropane	1,1,2,2-tetrachloroethane
1,3-dichloropropene	1,1,2-trichloroethane
Diesel PM	1,2,4-trimethylbenzene
Ethyl benzene	Toluene
Ethylenedibromide////	Vanadium
Formaldehyde	Vinyl Chloride
H ₂ S	Xylenes
HCl	Zinc
Hexamethylene diisocyanate	Zinc Phosphate
Iso-octane (2,2,4-trimethylpentane)	

EXEMPT EMISSIONS UNITS (Form 1302-H)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

Are you claiming any emitting activities to be insignificant? (See definition at bottom of page)

YES X NO

I. ACTIVITIES CLAIMED TO BE INSIGNIFICANT (Attach supporting calculations)

Activity	Description of Activity/Emission Units	Potential to Emit for each Pollutant
Surface coating	facility-wide, for equipment maintenance and for structural coating	negligible, emissions not calculated

Insignificant activities are defined in APCD Rule 1301 (definitions). For an activity to be considered insignificant emissions cannot exceed 2 tons per year potential to emit (PTE) any criteria pollutants, and 0.5 tons per year for any regulated HAP.

Note: Insignificant activities are not exempt from Part 70 requirements/permits.

COMPLIANCE PLAN (Form 1302-I1)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

I. PROCEDURE FOR USING FORM 1302-I

- ☞ This form shall be submitted as part of the SBCAPCD's Regulation XIII Application. The Responsible Official shall identify the applicable federal requirement(s) to which the source is subject. In the Compliance Plan (Form 1302-I), a Responsible Official shall identify whether the source identified in the SBCAPCD's Regulation XIII Application currently operates in compliance with all applicable federal requirements.

II. APPLICABLE FEDERAL REQUIREMENTS

Applicable Federal Requirement ¹		Affected Emission Unit	In compliance? (yes/no/ exempt ³)	Effective Date ⁴
Regulatory Reference ²	Regulation Title ²			
40 CFR Part 60, Subpart KKK	NSPS for Equipment Leaks of VOC from Onshore Natural Gas Processing Plants	Fugitive emission components	Yes	in effect
40 CFR Part 64	Compliance Assurance Monitoring	IC Engines (ID#s107447, 107455 through 107459, 100222, 8166)	Yes	in effect
40 CFR Part 70	Operating Permits	Entire Facility	Yes	in effect
See Attached - Applicable Federal Requirements				
¹ Review APCD SIP Rules, NSPS, NESHAPS, and MACTs . ² Regulatory Reference is the abbreviated citation (e.g. 40 CFR 60 Subpart OOO, APCD Rule 325.H) and Title is the prosaic title (e.g. NSPS Standards of Performance for Nonmetallic Mineral Processing Plants, Crude Oil Production and Separation, Inspection) ³ If exempt from applicable federal requirement, include explanation for exemption. ⁴ Indicate the date during the permit term that the applicable federal requirement will become effective for the emission unit.				

Other Applicable Federal Requirements ⁵	Affected Emission Unit	In compliance?	Effective Date
⁵ All environmentally significant permit conditions -- such as emission, operation, and throughput limitations or compliance monitoring conditions associated with such limitations -- listed in all authority to construct (ATC) permits issued to the Part 70 source are also applicable requirements.			

*** If more than one page is used, please ensure that "Santa Barbara APCD", stationary source name and "Form 1302-I1" appear on each page. ***

II. APPLICABLE FEDERAL REQUIREMENTS

SANTA BARBARA COUNTY APCD, VENOCO CARPINTERIA GAS PLANT, PTO 7996, FORM 1302-II (CONT'D)

Applicable Federal Requirement				
Regulatory Reference	Regulation Title	Affected Emission Unit	In Compliance?	Effective Date
Generic Federally-Enforceable APCD Rules				
Rule 101	Compliance by Existing Installations	All emission units	Yes	in effect
Rule 102	Definitions	All emission units	Yes	in effect
Rule 103	Severability	All emission units	Yes	in effect
Rule 201	Permits Required	All emission units	Yes	in effect
Rule 202	Exemptions to Rule 201	Emission units listed on PTO Attachment 10.6	Yes	in effect
Rule 203	Transfer	All emission units	Yes	in effect
Rule 204	Applications	All emission units	Yes	in effect
Rule 205	Standards for Granting Permits	All emission units	Yes	in effect
Rule 206	Conditional Approval of ATC or PTO	All emission units	Yes	in effect
Rule 207	Denial of Applications	All emission units	Yes	in effect
Rule 208	Action on Applications – Time Limits	All emission units. Not applicable to Part 70 Permit applications.	Yes	in effect
Rule 212	Emission Statements	All emission units	Yes	in effect
Rule 301	Circumvention	All emission units	Yes	in effect
Rule 302	Visible Emissions	All emission units	Yes	in effect
Rule 303	Nuisance	All emission units	Yes	in effect
Rule 305	PM Concentration – Southern Zone	Each PM source	Yes	in effect
Rule 309	Specific Contaminants	All emission units	Yes	in effect
Rule 310	Odorous Organic Sulfides	All emission units	Yes	in effect
Rule 311	Sulfur Content of Fuel	All combustion units	Yes	in effect
Rule 317	Organic Solvents	Emission units using solvents	Yes	in effect
Rule 321	Solvent Cleaning Operations	Emission units using solvents	Yes	in effect
Rule 322	Metal Surface Coating Thinner and Reducer	Emission units using solvents	Yes	in effect
Rule 323	Architectural Coatings	Paints used in maintenance & surface coating activities	Yes	in effect
Rule 324	Disposal and Evaporation of Solvents	Emission units using solvents	Yes	in effect
Rule 353	Architectural Coatings	Units using adhesives/sealants	Yes	in effect
Rule 505	Breakdown Conditions	All emission units	Yes	in effect
Rule 603	Emergency Episode Plans	Stationary sources with PTE greater than 100 tpy	Yes	in effect

Applicable Federal Requirement				
Regulatory Reference	Regulation Title	Affected Emission Unit	In Compliance?	Effective Date
Reg. VIII Rules 801-808	New Source Review	All emission units	Yes	in effect
Reg. XIII Rules 1301-1305	Part 70 Operating Permits	All emission units	Yes	in effect
Unit-Specific Federally-Enforceable APCD Rules				
Rule 325	Crude Oil Production and Separation	Storage tank: ID #s 8168 and 8169	Yes	in effect
Rule 326	Storage of Reactive Organic Compound Liquids	Crude oil storage tank: ID #112320	Yes	in effect
Rule 331	Fugitive Emissions I&M	All components (valves, flanges, seals, compressors and pumps) used to handle oil and gas: ID #s 107468 through 107473	Yes	in effect
Rule 333	Control of Emissions from Reciprocating IC Engines	Piston IC engines only; ID #s 107447, 107455 through 107459, 100222, 109278	Yes	in effect
Rule 343	Petroleum Storage Tank Degassing	Storage tank: ID #s 8168, 8169 & 112320	Yes	in effect
Rule 360	Emissions of Oxides of Nitrogen from Large Water Boilers and Small Boilers	Any new small boiler installed at the facility	Yes	in effect
Rule 361	Small Boilers, Steam Generators and Process Heaters	Heaters: ID #s 191 & 195	Yes	in effect


COMPLIANCE PLAN (Form 1302-I2)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS Processing ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

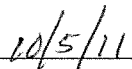
III. COMPLIANCE CERTIFICATION

Under penalty of perjury, I certify the following:

- ☒ Based on information and belief formed after reasonable inquiry, the source identified in this application will continue to comply with the applicable federal requirement(s) with which the source is in compliance identified in form 1302-I1;
- ☐ Based on information and belief formed after reasonable inquiry, the source identified in this application will comply with the future-effective applicable federal requirement(s) identified in form 1302-I1, on a timely basis¹;
- ☐ Based on information and belief formed after reasonable inquiry, the source identified in this application is not in compliance with the applicable federal requirement(s), identified in form 1302-I1, and I have attached a compliance plan schedule.²



Signature of Responsible Official



Date

1. Unless a more detailed schedule is expressly required by the applicable federal requirement.
2. At the time of expected permit issuance, if the source expects to be out of compliance with an applicable federal requirement, the applicant is required to provide a compliance schedule with this application, with the following exception. A source which is operating under a variance that is effective for less than 90 days need not submit a Compliance Schedule. For sources operating under a variance, which is in effect for more than 90 days, the Compliance Schedule is the schedule that was approved as part of the variance granted by the hearing board.

The compliance schedule shall contain a schedule of remedial measures, including an enforceable sequence of actions with milestones, leading to compliance with this applicable federal requirement. For sources operating under a variance, the compliance schedule is part of the variance granted by the hearing board. The compliance schedule shall resemble, and be at least as stringent as that contained in any judicial consent decree or administrative order to which the source is subject. For sources not operating under a variance, consult the Air Pollution Control Officer regarding procedures for obtaining a compliance schedule.

CERTIFICATION STATEMENT (Form 1302-M)


APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

Identify, by checking off below, the forms and attachments that are part of your application. If the application contains forms or attachments that are not identified below, please identify these attachments in the blank space provided below. Review the instructions if you are unsure of the forms and attachments that need to be included in a complete application.

Forms included with application <input checked="" type="checkbox"/> Stationary Source Summary Form <input checked="" type="checkbox"/> Total Stationary Source Emission Form <input checked="" type="checkbox"/> Compliance Plan Form <input checked="" type="checkbox"/> Compliance Plan Certification Form <input checked="" type="checkbox"/> Exempt Equipment Form <input checked="" type="checkbox"/> Certification Statement Form List other forms or attachments _____ _____ _____ _____ [] check here if additional forms listed on back	Attachments included with application <input type="checkbox"/> Description of Operating Scenarios <input type="checkbox"/> Sample emission calculations <input type="checkbox"/> Fugitive emission estimates <input checked="" type="checkbox"/> List of Applicable requirements <input type="checkbox"/> Discussion of units out of compliance with applicable federal requirements and, if required, submit a schedule of Compliance <input type="checkbox"/> Facility schematic showing emission points <input type="checkbox"/> NSR Permit <input type="checkbox"/> PSD Permit <input type="checkbox"/> Compliance Assurance monitoring protocols <input type="checkbox"/> Risk management verification per 112(r)
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I certify under penalty of law, based on information and belief formed after reasonable inquiry, that the information contained in this application, composed of the forms and attachments identified above, are true, accurate, and complete.

I certify that I am the responsible official, as defined in SBCAPCD's Regulation XIII, Rule 1301 or USEPA's 40 CFR Part 70.

Signature of Responsible Official  Date 10/5/11

Print Name of Responsible Official: Ed O'Donnell

Title of Responsible Official and Company Name: Sr. Vice President

CERTIFICATION STATEMENT
(Form 1302-M continued)

APCD: Santa Barbara County Air Pollution Control District	> APCD USE ONLY < APCD IDS PROCESSING ID:
COMPANY NAME: Venoco Inc.	SOURCE NAME: Carpinteria Gas Plant

List Other Forms or Attachments (cont.)
